

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE
PLAYERS' CONCUSSION INJURY
LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

THIS DOCUMENT RELATES TO:

Simmons, et al. v. National Football League, et al., No. 2:13-cv-06354

**MOTION FOR LEAVE TO APPEAR TELEPHONICALLY AT
THE ORGANIZATIONAL MEETING FOR ALL OPT OUT
PLAINTIFFS SCHEDULED FOR MARCH 27, 2017**

Plaintiff Thomas Clapp, II, hereby moves this Court for an order granting leave for David B. Franco (hereinafter "Franco") of FrancoLaw, PLLC, co-counsel for Plaintiff Clapp, to appear telephonically for the Organizational Meeting for all Opt Out Plaintiffs scheduled for March 27, 2017 at 10:00 A.M. In support hereof, Plaintiff states:

1. This Court has set March 27, 2017 at 10:00 A.M., for the Organizational Meeting for all Opt Out Plaintiffs.
2. Mr. Franco is a resident of Travis County, Texas and has a commitment in New Orleans set on March 27, 2017.
3. Plaintiff respectfully requests that this Court permit Mr. Franco to appear telephonically to avoid the time and expense associated with traveling to Philadelphia, Pennsylvania from New Orleans, Louisiana.

WHEREFORE, Plaintiff respectfully requests Mr. Franco be permitted to appear by telephone at the meeting scheduled for March 27, 2017 at 10:00 A.M.

Dated: March 23, 2017

Respectfully submitted,

s/ David B. Franco

David B. Franco (TX# 24072097)

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, the undersigned hereby certify that on March 23, 2017, I caused the foregoing document to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ David B. Franco

David B. Franco